

UNITED STATES DISTRICT COURT
DISTRICT OF NEBRASKA

CASE NO. 24-CV-00160-MDN

UNITED STATES OF AMERICA,
Plaintiff,

v.

\$4,698,514.00 in U.S. Currency, et al.,
Defendant.

_____/

VERIFIED CLAIM OF BROOKE BREGMAN

Claimant Brooke Bregman, by and through undersigned counsel, submits this Verified Claim in accordance with Rule G(5)(a)(i) of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions. Ms. Bregman hereby states her claim to, and interest in, the following assets listed in the Complaint for Forfeiture *In Rem* filed in this action on or about May 3, 2024:

- \$4,698,514.00 in United States Currency;
- \$630,680.00 in United States Currency;
- KAWS “Close the Door Behind You” Painting;
- Andy Warhol Apple Painting;
- Rolex Daytona Chronograph Watch;
- Audemars Piquet Oak Offshore Chronograph Watch;
- Patek Philippe Aquanaut Watch;
- Rolex Day-Date 36 President Watch;

- Rolex “Hulk” Submariner Watch;
- Rolex President Day-Date 18k Rose Gold Watch;
- Platinum and Diamond 3 Stone Ring;
- Silver Metal and Diamond 36MM Bezel;
- 14K White Gold and Diamond Tennis Bracelet;
- Australian Gold Lunar \$100 Coin;
- Counterfeit Cartier 18K Love Bracelet;¹
- Hermès Grand Attelage Flatware.

A. The Defendant Cash

On December 12, 2023, \$4,698,514.00 in U.S. currency was seized from Adam Bregman’s² condominium unit, located at 1645 Vine Street, #1007, in Los Angeles, California and \$630,680.00 in U.S. currency was seized from the Bregmans’ marital residence, located at 1904 SE Colony Way in Jupiter, Florida. Brooke Bregman claims an interest in the Defendant Cash (a total of \$5,329,194). The Defendant Cash is both personal property of Brooke Bregman and joint marital property of Adam and Brooke Bregman. Brooke Bregman also asserts a possessory

¹ This property is not counterfeit. The bracelet was purchased directly from Cartier Jeweler by Adam and Brooke Bregman on February 14, 2018.

² Adam Bregman is Brooke Bregman’s husband.

and community property interest in the Defendant Cash, as a joint owner of the Defendant Cash.

B. The Defendant Art

On December 12, 2023, two pieces of art were seized from Bregmans' marital residence in Florida: a KAWS "Close the Door Behind You" Painting and an Andy Warhol Apple Painting. The Defendant Art is owned by Adam and Brooke Bregman. Brooke Bregman claims a personal property interest, joint marital property interest, community property interest, and possessory interest in the Defendant Art.

C. The Defendant Jewelry

On December 12, 2023, three watches (Rolex Daytona Chronograph Watch, Audemars Piquet Oak Offshore Chronograph Watch, and Patek Philippe Aquanaut Watch) were seized from Adam Bregman's condo in California. The Defendant Watches are owned by Adam Bregman. Brooke Bregman asserts a joint marital property interest, community property interest, and possessory interest in the Defendant Watches.

On December 12, 2023, multiple pieces of jewelry were seized from the Bregmans' marital home in Florida. Among this jewelry was some of the Defendant Jewelry, including: Platinum and Diamond 3 Stone Ring, Rolex Day-Date 36 President Watch, Silver Metal and Diamond 36MM Bezel, 14K White Gold and

Diamond Tennis Bracelet, Australian Gold Lunar \$100 Coin, Counterfeit Cartier 18K Love Bracelet, Hermès Grand Attelage Flatware, Rolex “Hulk” Submariner Watch, and Rolex President Day-Date 18k Rose Gold Watch). Adam Bregman is the owner of the two Rolex Watches. Brooke Bregman asserts a joint marital property interest, community property interest, and possessory interest in the Defendant Rolex Watches. Brooke Bregman is the owner of the Platinum and Diamond 3 Stone Ring, Rolex Day-Date 36 President Watch, Silver Metal and Diamond 36MM Bezel, 14K White Gold and Diamond Tennis Bracelet, Australian Gold Lunar \$100 Coin, the Cartier 18K Love Bracelet and Hermès Grand Attelage Flatware. Brooke Bregman asserts a personal interest, joint marital property interest, community property interest, and possessory interest in these pieces of Defendant Jewelry.

Dated: September 24, 2024

Respectfully submitted,

/s/ Richard C. Klugh

Richard C. Klugh, Esq.

Fla. Bar No. 305294

Courthouse Center, Penthouse One

40 NW Third Street

Miami, FL 33128

Tel. (305) 374-3998

E-Mail rickklu@aol.com

VERIFICATION

I, Brooke Bregman, make this verification on my own behalf. I have read the foregoing Verified Claim of Brooke Bregman responsive to the Verified Complaint in *United States v. \$4,698,514.00 in U.S. Currency, et al.*, Case No. 24-CV-00160-MDN, and know the contents of the Verified Claim.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed and signed on September 24, 2024, at Jupiter, Florida.


Brooke Bregman

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 24th, 2024, the undersigned caused the foregoing to be filed with the United States District Court for the District of Nebraska using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

KIMBERLY C. BUNJER, #20962

Assistant U.S. Attorney

1620 Dodge Street, Suite 1400

Omaha, NE 68102-1506

Tel: (402) 661-3700

Fax: (402) 345-5724

E-mail: kim.bunjer@usdoj.gov

Attorney for Plaintiff

MIKALA PURDY-STEENHOLDT

Assistant U.S. Attorney

1620 Dodge Street, Suite 1400

Omaha, NE 68102-1506

Tel: (402) 661-3700

Fax: (402) 345-5724

E-mail: MPurdySteenholdt@usa.doj.gov

Attorney for Plaintiff

The undersigned further certifies that on September 24, 2024, the undersigned caused a true and correct copy of the foregoing to be served, by depositing a copy via FedEx overnight, upon the following non-CM/ECF participants: Kim Bunjer, Mikala Purdy-Steenholdt:

Respectfully submitted,

/s/ Richard C. Klugh

Richard C. Klugh, Esq.

Fla. Bar No. 305294

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